

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

EVDOKIA NIKOLOVA,
Plaintiff,

v.

UNIVERSITY OF TEXAS AT AUSTIN,
Defendant.

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Civil Action No.: 1:19-CV-00877

DEFENDANT'S FIRST AMENDED EXHIBIT LIST

TO THE HONORABLE JUDGE PITMAN:

Defendant The University of Texas at Austin respectfully submits this First Amended Exhibit List. For the convenience of the Court and Plaintiff, any substantive changes are identified with red text.

DEF'S Ex. #	DESCRIPTION	EXPECTS TO OFFER	MAY OFFER
1	HOP 2-2010. Academic Titles & Tenure	X	
2	HOP 2-2010. Extension of the Tenure Track Probationary Period	X	
3	HOP 2-2240. Modified Instructional Duties	X	
4	General Guidelines for Promotion & Tenure AY 2018-19	X	
5	Cockrell School of Engineering Dossier-Promotion Checklist		X
6	2018-19 Evaluation Template P&T Committee		X
7	05/22/2013. Hiring committee emails		X
8	05/28/2013. Emails re hiring committee vote, extending offer		X
9	06/07/2013. Signed offer letter		X
10	10/08/2015. Nikolova's MID memoranda	X	
11	11/20/2015. Nikolova probationary extension docs	X	
12	11/20/2015. Letter approving probationary extension signed by Nikolova	X	
13	04/13/2018. Nikolova MID memoranda	X	

DEF'S Ex. #	DESCRIPTION	EXPECTS TO OFFER	MAY OFFER
14	05/06/2018. Budget Council (first) vote on Nikolova promotion		X
15	05/31/2018. Nikolova's Revised Third-Year Review and transmission email		X
16	07/28/2018. Email thread regarding students, fiancé working on dossier (1)		X
17	08/02/2018. Email thread regarding students, fiancé working on dossier (2)		X
18	08/03/2018. Email thread regarding students, fiancé working on dossier (3)		X
19	09/10/2018. Budget Council (second) vote on Nikolova promotion		X
20	09/10/2018. Budget Council comments on Nikolova promotion		X
21	10/26/2018. Email thread re P&T Committee question (1)		X
22	10/26/2018. Email thread re P&T Committee question (2)		X
23	10/29/2018. Chair's letter in support of promoting Nikolova		X
24	11/14/2018. Email re P&T evaluation of Nikolova & evaluation		X
25	11/20/2018. Dean's Assessment of Nikolova	X	
26	Texts between Tewfik & Nikolova (Nov. 2018–March 2019)		X
27	03/01/2019. Email re unsolicited recommendation letter		X
28	03/25/2019. Nikolova letter to CCAFR		X
29	03/25/2019. Nikolova final argument letter to Fenves		X
30	03/26/2019. Nikolova email submitting final argument letter		X
31	03/26/2019. Nikolova email submitting CCAFR letter		X
32	04/24/2019. Reminder email regarding peer teaching evaluation	X	
33	04/25/2019. Emails reassigning Nikolova's peer teaching evaluation	X	
34	05/07/2019. Email thread between Nikolova & Julien regarding teaching evaluation	X	
35	05/07/2019. Emails submitting teaching evaluation	X	

DEF'S Ex. #	DESCRIPTION	EXPECTS TO OFFER	MAY OFFER
36	05/10/2019. Letter submitting EEOC Charge & Charge Withdrawn.		X
37	05/13/2019. President's letter responding to CCAFR sub-committee letter		X
38	06/13/2019. EEOC's right to sue letter Withdrawn.		X
39	09/05/2019. Emails regarding senior design supervision (1)		X
40	09/06/2019. Emails regarding senior design supervision (2)		X
41	09/06/2019. Emails regarding senior design supervision (3)		X
42	09/06/2019. Emails regarding senior design supervision (4)		X
43	09/16/2019. Nikolova's MID memoranda		X
44	09/20/2019. Nikolova's probationary extension docs		X
45	05/13/2020. Emails regarding missing FARs	X	
46	05/17/2020. Orshansky's rating for Nikolova	X	
47	05/17/2020. Caramanis's rating for Nikolova	X	
48	Nikolova's Tenure Dossier	X	
49	2019-20 ECE Faculty Annual Performance Rankings	X	
50	Expert Report of Donald R. Deere, Ph.D. (Dkt. #35-1) Tables 1-4 from Expert Report of Donald R. Deere (redacted to remove Table titles)	X	
51	15-16 Department Annual Review (UT Austin_0026196)	X	
52	16-17 Department Annual Review (UT Austin_0026197)	X	
53	17-18 Department Annual Review (UT Austin_0026198)	X	
54	18-19 Nikolova Annual Review (UT Austin_0026203)	X	
55	07/15/2013. Email regarding Nikolova's Offer Salary (UT Austin_0008200)		X
56	05/04/2016. Email 16-17 Merit Raises (UT Austin_0007343)		X
57	08/03/2017. Email regarding 17-18 Merit Raises (UT Austin_0017526)		X
58	08/03/2017. Email Attachment (UT Austin_0017528)		X
59	07/02/2018. Email 18-19 Merit Raises (UT Austin_0026425)		X
60	07/02/2018. Email Attachment (UT Austin_0026426)		X
61	06/14/2019. Email 19-20 Merit Raises (UT Austin_0026711)		X
62	Salary Spreadsheet ECE 2009-19 (UT Austin_0026708)	X	

DEF'S Ex. #	DESCRIPTION	EXPECTS TO OFFER	MAY OFFER
63	02/19/2019. Email regarding tenure decision and Dean's advice (UT Austin_0018998-19001)	X	
64	04/21/2019. Email regarding peer teaching evaluations (P003072-73)	X	
65	05/17/2020. Email re missing FARs (UT Austin_0026519)	X	

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2022, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Benjamin L. Dower

BENJAMIN L. DOWER

Deputy Chief for General Litigation Division